

ATTORNEYS AT LAW

Atlanta Austin Charleston Dallas Los Angeles New York St. Louis San Francisco

Writer's Direct: (213) 486-8046  
Writer's Email: rkim@hptylaw.com

June 15, 2015

**VIA U.S. MAIL**

Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6) Suite 100  
5 Post Office Square  
Boston, MA 02109-3912

**Re: Freedom of Information Act Request**  
***Stephen Archdeacon v. Ameron International, et al.***  
Superior Court of the State of California County of Riverside  
Case No. PSC 1405321  
Our Client: Maremont Corporation

Dear Custodian of Records:

We are requesting the disclosure of the following records pursuant to the Freedom of Information Act (5 USCS § 552) within the next twenty business days. All requested records pertain to the following locations between 1970-2005:

- **Osco Drug, Waltham Plaza Shopping Center, 1070 Lexington St, Waltham, MA 02452;**
- **Oak Square Getty, 602 Washington St., Brighton, MA 02135;**
- **Shell Gas Station, 332 Chestnut Hill Ave, Brighton, MA 02135**
- **Department of Mental Health - Central Office, 25 Staniford Street, Boston, MA 02114;**
- **Lowell Institute for Savings, 30 Colonial Dr. Westford, MA 01886**
- **Sullivan & Cogliano, 230 2nd Ave #200, Waltham, MA 02451**
- **DeCordova Museum, 51 Sandy Pond Rd, Lincoln, MA 01773**

(1) Any records or documents<sup>1</sup> pertaining to the practices, maintenance, and safety procedures of the work performed at the locations above or any prior location of the Premises, which in any way involved asbestos.

---

<sup>1</sup> The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, 11240305v.1

(2) Any records or documents identifying any and all persons, contractors, or other entities who were involved in the practices, maintenance, and safety procedures of the work performed at the locations above or any prior location of the Premises, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos abatement or clean-up work and any industrial/chemical abatement or clean-up work performed at the locations above or any prior location of the Premises.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling, which measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed at the locations above or any prior location of the Premises.

(5) Any records, documents, or letters to or from the Occupational Safety & Health Administration pertaining to warnings, citations, or violations at the locations above or any prior location of the Premises, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by the Occupational Safety & Health Administration, which addressed the issue of health hazards created by or associated with exposure to asbestos at the locations above or any prior locations of the Premises.

(7) Any written communication from the Occupational Safety & Health Administration, which in any way involved asbestos, regarding the locations above or any prior locations of the Premises.

5 USCS § 552(b) allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt from release, please provide the remainder of the documents. Further, please justify any withholding by demonstrating that the records are exempt or that the public interest in confidentiality outweighs the public interest in disclosure. We reserve the right to appeal any such determination.

We agree to pay the reasonable costs involved in retrieving and copying the requested records. If there are any fees for searching or copying these records, please inform me if the cost will exceed \$100.00. This information is not being sought for commercial purposes.

5 USCS § 552 requires a response within twenty (20) business days. If access to the records will take longer than this amount of time, please contact me with information about when I might expect copies or the ability to inspect the requested records.

---

drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in the your possession, custody, or control or known or believed by the you to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.



Hawkins Parnell  
Thackston & Young LLP  
June 15, 2015  
Page 3

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available under the law.

If you have any questions, please feel free to contact Raymond Kim at (213) 486-8046 or by e-mail at [rkim@hptylaw.com](mailto:rkim@hptylaw.com).

Sincerely,

**HAWKINS PARNELL  
THACKSTON & YOUNG<sup>LLP</sup>**

A handwritten signature in black ink, appearing to read 'R Kim', written over the printed name of Raymond Kim.

Raymond Kim  
*Paralegal*